

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**RESPONSE OF POSTAL SERVICE WITNESS MARTIN TO
INTERROGATORY OF THE PUBLIC REPRESENTATIVE
(PR/USPS-T6-13)**

The United States Postal Service hereby provides its response to the above-referenced interrogatory of the Public Representative, dated February 23, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

Daniel J. Foucheaux, Jr.
Chief Counsel, Pricing and Product Support

Matthew J. Connolly
Attorney

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 268-8582; Fax -5418
matthew.j.connolly@usps.gov
March 13, 2012

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN
TO INTERROGATORY OF THE PUBLIC REPRESENTATIVE**

PR/USPS-T6-13. In your response to PR/USPS-T6-3 (b) you state: “The trip-specific, capacity-utilization data contained in the “Plant to Plant Trips” spreadsheet in library reference USPS-LR-N2012-1/11 shows that there is excess capacity throughout the plant-to-plant transportation network”. In response to PR/USPS-T6-4 (a) you state: “Truck capacity utilization is calculated from data that are uploaded to our transportation databases (Surface Visibility or Transportation Information Management Evaluation System (“TIMES”)).

- a. Please confirm that ‘utilization’ provided in USPS-LR-N2012-1/11 is the same as ‘truck capacity utilization’ you mention in your response to PR/USPS-T6-4 (a). If not confirmed, please explain the difference.
- b. Please confirm that you understand excess capacity as insufficient capacity utilization. If not confirmed please explain.

RESPONSE:

- (a) Confirmed.
- (b) Not confirmed. Capacity utilization on a trip is not evaluated in terms of its sufficiency or insufficiency. The term “excess capacity,” as used in my response to PR/USPS-T6-3(b), means that many trips have unused capacity; we increase efficiency and capacity utilization by reducing unused (or excess) capacity.